

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Chapter 11
)	
UAL CORPORATION, et al.,)	Case No. 02-B-48191
)	(Jointly Administered)
Reorganized Debtors.)	
)	
<hr/>)	
UNITED AIR LINES, INC.,)	Adversary Proceeding No. 05-02806
)	
Plaintiff,)	
)	08 cv 3337
)	
THE CITY OF LOS ANGELES, a municipal corporation, and LOS ANGELES WORLD AIRPORTS,)	Judge Moran
)	Magistrate Judge Schenkier
)	
Defendants.)	

**AGREED MOTION FOR EXTENSION OF TIME AND AUTHORITY FOR UNITED TO
FILE BRIEF IN EXCESS OF 15 PAGES**

United Air Lines, Inc. (“United”) files this motion (the “Motion”) respectfully requesting that this Court: (i) grant both United and the defendants (the “City”, collectively with United, the “Parties”) an additional sixteen (16) days, until August 15, 2008, to reply to the other Party’s objections (the “Objections”) to Judge Wedoff’s May 31, 2008, Proposed Findings of Fact and Conclusion of Law (the Proposed Order); and (ii) grant United up to and including sixty (60) pages to reply to the City’s Objections. In support thereof, United states as follows:

1. On May 31, 2008, Judge Wedoff entered the Proposed Order.

2. Following the entry of the Proposed Order, the Parties reached agreement on a proposed briefing schedule for the objections and responses thereto, which was approved by

Judge Wedoff in an agreed order entered on June 10, 2008 [Dkt. No. 248] (the “Extension Order”).

3. The Extension Order provided each of the Parties until June 30, 2008 in which to file any objection to the Proposed Order, and a total of 30 days from the date of any such objection, July 30, 2008, in which to file any response.

4. Since the entry of the Extension Order, the case and the record has been assigned to this Court.

5. Both Parties filed their respective Objections to the Proposed Order on June 30, 2008. In addition to its 60-page Objection, the City filed a motion seeking authority *in statu nascendi* to exceed the page limitations set forth in Local Rule 7.1, or any other applicable rule, to the extent any such rules are applicable (the “City Motion”).

6. United has no objection to the City Motion, provided however, that United be given an additional (sixteen) 16 days, until August 15, 2008, to respond to the City’s Objections and also be given up to and including (sixty) 60 pages, if necessary, to respond.

7. The City has no objection to the relief requested in this Motion, provided it also be given an additional sixteen (16) days, until August 15, 2008, to respond to United’s Objections.

WHEREFORE, United respectfully requests that this Court enter an Order: (i) granting the Parties an additional sixteen (16) days, until August 15, 2008, to respond to the other Party's Objections; and (ii) granting United relief to file a brief in excess of 15 pages, up to and including sixty (60) pages, with respect to its response to the City's Objections.

Dated: Chicago, Illinois
July 1, 2008

Respectfully submitted,

/s/ Micah E. Marcus
James Joslin (ARDC No. 6229288)
Alex Karan (ARDC No. 6272495)
Micah E. Marcus (ARDC No. 6257569)
KIRKLAND & ELLIS LLP
200 East Randolph Drive
Chicago, Illinois 60601
(312) 861-2000 (telephone)
(312) 861-2200 (facsimile)

Counsel for United Air Lines, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Chapter 11
)	
UAL CORPORATION, et al.,)	Case No. 02-B-48191
)	(Jointly Administered)
Reorganized Debtors.)	
)	
<hr/>)	
UNITED AIR LINES, INC.,)	Adversary Proceeding No. 05-02806
)	
Plaintiff,)	
)	08 cv 3337
v.)	
)	
THE CITY OF LOS ANGELES, a municipal corporation, and LOS ANGELES WORLD AIRPORTS,)	Judge Moran
)	Magistrate Judge Schenkier
)	
Defendants.)	

AGREED ORDER

Upon the June 30, 2008 motion of the City for authority to file a brief in excess of 15 pages (the “City Motion”)¹ and the July 1, 2008 motion of United for an extension of time to reply to the City’s Objections and for authority to file a response to the City’s Objections in excess of 15 pages (the “United Motion”, collectively with the City Motion, the “Motions”); proper notice having been given; and the Court having reviewed and considered the Motions; and

Whereas, Judge Wedoff entered the Proposed Order on May 31, 2008; and

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the City Motion and/or the United Motion.

Whereas, the Parties reached agreement on objections and responses to the Proposed Order, which was approved by Judge Wedoff in an agreed order entered on June 10, 2008 [Dkt. No. 248] (the “Extension Order”), providing each of the parties an additional 20 days in which to file any objections, June 30, 2008, and a total of 30 days from the date of any such objection, July 30, 2008, in which to respond; and

Whereas, since the entry of the Extension Order, the case and the record has been assigned to this Court; and

Whereas, both parties filed their respective Objections to the Proposed Order on June 30, 2008; and

Whereas, when the City filed its 60-page Objections, it also filed the City Motion seeking authority *instanter* to exceed the page limitations set forth in Local Rule 7.1, or any other applicable rule, to the extent any such rules are applicable; and

Whereas, United has no objection to the City Motion, provided however, that United be granted relief requested in the United Motion, giving United an additional 16 days, until August 15, 2008, to respond to the City’s Objections and also giving United up to and including 60 pages, if necessary, to respond; and

Whereas, the City has no objection to the United Motion, provided it also be given an additional 16 days, until August 15, 2008 to respond to United’s Objection;

IT IS HEREBY AGREED, ORDERED, ADJUDGED, AND DECREED THAT:

1. Both the City Motion and the United Motion are hereby granted.
2. The City is granted relief *instanter* to file its Objections in excess of 15 pages.
3. The Parties are both granted an additional 16 days, until August 15, 2008, to file a response to the other Party’s Objections to the Proposed Order.

4. United shall be authorized to file a brief containing pages in excess of the Court's normal page limitation, up to and including 60 pages, with respect to its response to the Objections filed by the City.
5. This Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

Dated: Chicago, Illinois
_____, 2008

UNITED STATES DISTRICT JUDGE